



## OPERATIONAL MEMO

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<b>TITLE:</b>	<b>UPDATED CASE MANAGEMENT OPERATIONAL CHANGES IN RESPONSE TO COVID-19</b>
<b>SUPERSEDES NUMBER:</b>	<b>HCPF OM 21-013</b>
<b>EFFECTIVE DATE:</b>	<b>FEBRUARY 1, 2021</b>
<b>DIVISION AND OFFICE:</b>	<b>CASE MANAGEMENT AND QUALITY PERFORMANCE DIVISION, OFFICE OF COMMUNITY LIVING</b>
<b>PROGRAM AREA:</b>	<b>CASE MANAGEMENT AGENCIES</b>
<b>KEY WORDS:</b>	<b>COVID-19, CORONAVIRUS, CASE MANAGEMENT, FUNCTIONAL ELIGIBILITY ASSESSMENT, LEVEL OF CARE, CSR, ULTC 100.2, PROFESSIONAL MEDICAL INFORMATION PAGE, PMIP</b>
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<b>APPROVED BY: AMANDA LOFGREN</b>	

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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

The purpose of this Operational Memo is to inform Case Management Agencies (CMAs) of updated operational changes to case management documentation requirements for functional eligibility for long-term services and supports (LTSS) programs. This Operational Memo has been updated to reflect changes to Long Term Home Health (LTHH) and supersedes HCPF OM 21-013.

### **Information:**

On March 13, 2020, the Department of Health Care Policy & Financing (Department) issued guidance removing the requirement to obtain a completed Professional Medical Information Page (PMIP) and extending the amount of time a case manager has to obtain the forms required for all eligibility assessments to 60 days.

The Department is modifying the extension and is requiring the completed forms, including a completed PMIP, to be received by the case manager for **all initial**

assessments as outlined in Medicaid Volume 8 Regulations: 8.393.2.E.3.e, 8.393.3.A.1.c.i.3, 8.519.11.B.2.a.viii, and 8.607.4.d.8.

**Members who receive an initial assessment on or after February 1, 2021 must have all required forms fully completed in order to be determined functionally eligible for a requested program.**

This change includes the required eligibility forms for the following programs:

- Home and Community-Based Service (HCBS) Waivers
- Nursing Facility (NF)
- Program of All-Inclusive Care for the Elderly (PACE)
- Hospital Back-Up (HBU)
- Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF/IID)
- Long Term Home Health (LTHH)
- Targeted Case Management
- Colorado Choice Transitions (CCT)
- State General Fund Programs (SGF)
  - Family Support Services Program (FSSP)
  - State Supported Living Services (State-SLS)
  - Ombudsman Reconciliation Act (OBRA)

#### Continued Stay Review Assessments

**The Department has discontinued the requirement for a case manager to obtain a completed PMIP for Continued Stay Review HCBS functional eligibility assessments.**

**Due to programmatic requirements, a completed PMIP will still be required for Initial and Continued Stay Review assessments for NF, PACE, HBU, and ICF/IID programs.**

**For members utilizing LTHH only, the case manager is able to continue using the Health Care Agency CMS-485 form in place of a PMIP for both initial and recertifications. A Frequently Asked Questions document is attached to support case managers through this change.**

For members who are missing other paperwork at their Continued Stay Review Assessment, the Federal Maintenance of Effort requirement prohibits members who are enrolled in a Medicaid Program, including HCBS waiver programs, from being terminated during the Public Health Emergency for missing documentation, as outlined in OM 20-045 found on the [Department's Memo Series page](#). The case manager shall

track and make continual attempts to obtain the missing program documentation (ex. HCBS Statement of Agreement) as required in Medicaid Volume 8 Program Rule.

Please note, a member may be removed from a service or service delivery option if the required signed forms for the specific service have not been received. An example would be the In-Home Support Services Physician Attestation which is a requirement to receive services through the service delivery option but is not a requirement for overall HCBS waiver eligibility.

The Department will notify case management agencies of additional actions to be taken when the Public Health Emergency has ended.

Questions regarding this guidance can be sent to [HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us).

**Attachment(s):**

Professional Medical Information Page Frequently Asked Questions

**Department Contact:**

[HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)

**Department COVID-19 Webpage:**

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information, please call the CDPHE Call Center at 303-692-2700. For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email COHELP@RMPDC.org, for answers in English and Spanish (Español), Mandarin (普通话), and more.